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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

KELLY WILSON, an individual,

Plaintiff,

vs.

THE WALT DISNEY COMPANY, a Delaware corporation; DISNEY ENTERPRISES, INC., a Delaware corporation; WALT DISNEY PICTURES, a California corporation; WALT DISNEY MOTION PICTURES GROUP, INC., a California corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. 3:14-cv-01441-VC

ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF J.A. TED BAER IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Judge: Hon. Vince G. Chhabria

Date: April 9, 2015

Time: 10:00 a.m.

Ctrm: 4

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE THAT, pursuant to Local Rules 79-5 and 7-11, plaintiff Kelly Wilson ("Plaintiff") submits this Administrative Motion to File Under Seal ("Administrative Motion") Exhibits (or redacted portions thereof) 1, 3-12, 17, and 19 to the Declaration of J.A. Ted Baer in Opposition to Defendants' Motion for Summary Judgment and the unredacted version of the Memorandum of Points and Authorities in Opposition to Defendants' Motion for Summary Judgment and in Further Support of Plaintiff's Motion for Partial Summary Judgment which makes reference to information contained in those exhibits.

Plaintiff submits this Administrative Motion solely in deference to the confidentiality designations made by Defendants in this action under the Confidentiality Stipulation and Protective Order (Doc. 47) entered by the Court in this action.

By filing this Administrative Motion, Plaintiff neither concedes nor supports the sealing of the documents as to which Defendants have asserted confidentiality. Rather, Plaintiff submits that sealing should not be considered by the Court absent a clear, compelling and convincing reason to except these documents from the general rule that judicial records are public records. *See In re NVIDIA Corp. Derivative Litigation No. 125*, 2008 WL 1859067, at *3 (N.D. Cal. 2008).

Dated: March 19, 2015

ARIAS OZZELLO & GIGNAC LLP

By: 

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